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10 Clark County, Lynn Marie Goya  
11 and Steve Wolfson (in their official  
12 capacities)

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 \* \* \* \* \*

16 UNIVERSAL LIFE CHURCH MONASTERY )  
17 a/k/a UNIVERSAL LIFE CHURCH, )  
18 Plaintiff, ) ) CASE NO. 2:18-cv-02099-RFB-BNW  
19 vs. )  
20 CLARK COUNTY, NEVADA; LYNN MARIE )  
21 GOYA (in her official capacity as Clark County )  
22 Clerk); STEVE WOLFSON (in his official )  
23 capacity as the Clark County District Attorney); )  
24 JANE DOE; JOHN ROE; and JANE POE, )  
25 Defendants. )  
26 )  
27 )  
28 )

**STIPULATED CONFIDENTIALITY AGREEMENT AND PROTECTIVE ORDER**

21 Plaintiff UNIVERSAL LIFE CHURCH MONASTERY a/k/a UNIVERSAL LIFE  
22 CHURCH, by and through its attorneys of record, Ronald D. Green, Esq., and Defendants  
23 CLARK COUNTY, LYNN MARIE GOYA and STEVE WOLFSON (in their official  
24 capacities), and through their attorneys of the law firm of Olson, Cannon, Gormley & Stoberski,  
25 hereby stipulate and agree to the entry of this Confidentiality Agreement and Protective Order  
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1 (this "Protective Order") in regard to the production of documents submitted by third parties to  
2 Clark County pursuant to Plaintiff's government records request with regard to any private and  
3 confidential information of any third parties contained on those documents. Nonetheless, the  
4 Parties recognize that such documents or other evidence might be relevant to the issues raised by  
5 the pleadings herein. Accordingly, the Parties desire to mutually agree to certain terms under  
6 which copies of potentially relevant documents or evidence may be produced during the course  
7 of this case while at the same time respecting the confidential nature of those documents or  
8 evidence.

10 1. Plaintiff agrees not to utilize any personal identifier information for any other  
11 purpose outside of this instant litigation.

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2. Plaintiff further agrees to hold confidential any personal identifier information on any third party and redact such information for any use of the documents in this litigation.

CONSENTED TO this 10<sup>th</sup> day of January, 2020.

## RANDAZZA LEGAL GROUP, PLLC

# OLSON CANNON GORMLEY & STOBERSKI

By /s/ Ronald D. Green  
Ronald D. Green, Esq.  
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Attorney for Plaintiff

By /s/ Thomas D. Dillard, Jr.  
Thomas D. Dillard, Jr., Esq.  
9950 W. Cheyenne Ave.  
Las Vegas, NV 89129  
Attorney for Defendants  
Clark County, Lynn Marie Goya  
and Steve Wolfson (in their official  
capacities)

## IT IS SO ORDERED

## ORDER

**DATED: January 13, 2020**

**BRENDA WEKSLER**  
**UNITED STATES MAGISTRATE JUDGE**